

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing During
Summer 2020 Demonstrations

This filing is related to:
ALL CASES

No. 20 Civ. 8924 (CM)(GWG)

**STIPULATION AND [PROPOSED]
ORDER**

IT IS HEREBY STIPULATED AND AGREED, by the non-stayed Plaintiffs and Defendants, that (1) Deputy Commissioner Carrie Talansky shall be deposed as a 30(b)(1) and 30(b)(6) witness on the already scheduled date of June 27, 2023; (2) a second deposition date may be held on either June 28, 29 or 30 of no more than four hours, if Plaintiffs reasonably believe they need additional time to complete her deposition; and (3) Defendants will produce to the non-stayed Plaintiffs a partial production of the pre-deposition materials required by ECF No. 670 for Deputy Commissioner Carrie Talansky no later than 5 p.m. on June 16, 2023, and a full production of the pre-deposition materials no later than 5 p.m. on June 21, 2023.

Dated: New York, New York
June 15, 2023

STIPULATED AND AGREED:

Hon. Sylvia O. Hinds-Radix
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/s/ Tahanie Aboushi

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Counsel for Plaintiffs in Rolon, et al v. City of New York, et al, No. 21-cv-2548

SO ORDERED:

Dated: _____
New York, New York _____
Hon. Gabriel Gorenstein